

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION



MAY 20 2020

UNITED STATES OF AMERICA	S David J. Bradley.	Clerk of Court
<b>v.</b>	. §	
JOHN CHARLIE KOFRON	§ CRIMINAL NO. 2:20mj116 §	54-1
AKA "JAY C"	§ FILED UNDER SEAL	

## MOTION TO SEAL COMPLAINT AND RELATED DOCUMENTS

## TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW the United States of America through its United States Attorney, Ryan K.

Patrick, in and for the Southern District of Texas, and Yifei Zheng, Assistant United States

Attorney, and moves the Honorable Court to seal the above-styled and numbered Complaint as knowledge of this Complaint at this time could compromise the arrest of the defendant.

WHEREFORE, PREMISES CONSIDERED, the United States respectfully requests the Court seal the above-entitled and numbered Complaint, this Motion to Seal and Order and the Arrest Warrant until the defendant is arrested.

Respectfully submitted,

RYAN K. PATRICK UNITED STATES ATTORNEY

By: <u>s/Yifei Zheng</u>

YIFEI ZHENG

Assistant United States Attorney

Southern District of Texas No: 3328108

New York State Bar No: 5424957

800 N. Shoreline Blvd., Suite 500

Corpus Christi, Texas 78401

Tel. (361) 888-3111

Fax (361) 888-3200